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Christine O. Gregoire

ATTORNEY GENERAL OF WASHINGTON

Utilities and Transportation Division

1400 S Evergreen Park Drive SW • PO Box 40128 • Olympia WA 98504-0128 • (360) 664-1183

January 20, 2000

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Magalie R. Salas, Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

RE: In the Matter of Common Carrier Seeks Comment on Requests to Redefine
"Voice Grade Access" for Purposes of Federal Universal Service Support
CC Docket No. 96-45

Dear Ms. Salas:

Enclosed for filing is the signed original Comments of the Washington Utilities and Transportation Commission in the above-referenced docket. We attempted to electronically file this document with the ECFS site on January 19, 2000, but ran into difficulties connecting with your server, so document was filed via e-mail. A copy of the e-mail is attached for your reference. Please let me know if this will cause any problems.

Please contact Tom Wilson at (360)-664-1293, tomw@wutc.wa.gov, if you have any questions about this filing.

Thank you for your assistance.

Sincerely,

MARY M. TENNYSON
Senior Assistant Attorney General

MMT:kl

Enclosure

cc: All parties
Sheryl Todd
International Transcription Service, Inc.

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List A B C D E

**Before the
Federal Communications Commission
Washington, DC 20554**

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In the Matter of)
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Common Carrier Seeks)
Comment on Requests to)
Redefine "Voice Grade Access")
For Purposes of Federal)
Universal Service Support)

CC Docket No. 96- 45

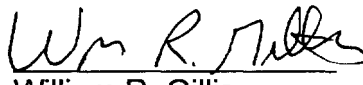
**Comments of the
Washington Utilities and Transportation Commission**

As a moving party, the Washington Utilities and Transportation Commission (WUTC) submits these comments on redefining "voice grade" access for federal universal service purposes in response to Public Notice DA 99-2985 released December 22, 1999. Since the WUTC's petition on February 10, 1998, seeking to redefine "voice grade" access for federal universal service purposes, the WUTC has conducted two workshops on the issue, and has learned that improvements to the definition of "voice grade" access for universal service purposes using technical terminology raises numerous difficult economic issues. The Federal-State Joint Board on Universal Service (Joint Board) is charged with reviewing the definition of basic universal service in January, 2001. The WUTC recommends that the matter be referred to the Joint Board for consideration of a revised definition that is not oriented to technical terminology.

Respectfully submitted this 19th day of January, 2000 by the Washington Utilities and Transportation Commission.


Marilyn Showalter
Chairwoman


Richard Hemstad
Commissioner


William R. Gillis
Commissioner

Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive Southwest
PO Box 47250
Olympia, Washington 98504-7250

Len Linley

From: Len Linley <lenlen@earthlink.net>
To: <ecfs@fcc.gov>
Cc: <klinley@wutc.wa.gov>; <mtennyson@wutc.wa.gov>
Sent: Wednesday, January 19, 2000 8:45 PM
Subject: Docket No. CC96-45

<PROCEEDING> CC 96-45
 <DATE> January 19, 2000
 <NAME> Tom Wilson
 <ADDRESS1> P.O. Box 40128
 <ADDRESS2> 1400 S. Evergreen Park Drive S.W.
 <CITY> Olympia
 <STATE> WA
 <ZIP> 98504-0128
 <LAW-FIRM> Office of the Attorney General
 <ATTORNEY> Mary M. Tennyson
 <FILE-NUMBER>
 <DOCUMENT-TYPE> Comment
 <PHONE-NUMBER> (360) 664-1194
 <DESCRIPTION>
 <CONTACT-EMAIL> tomw@wutc.wa.gov
 <TEXT>

Before the
Federal Communications Commission
Washington, DC 20554

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Common Carrier Seeks)

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Commissioner
Commissioner

Washington Utilities and Transportation Commission

1300 South Evergreen Park Drive Southwest

PO Box 47250

Olympia, Washington 98504-7250

1/19/00

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